

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

JESSICA HODGES, et al.)	
)	
Plaintiffs,)	
)	Case Number: 4:22-cv-00067-WTM-CLR
vs.)	
)	
CHATHAM COUNTY, GEORGIA, et al.)	
)	
Defendants.)	

EXHIBIT 12

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Plaintiffs,)	4:22-cv-00067-WTM-CLR
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CHATHAM COUNTY, GEORGIA,)	
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Defendants.)	

Deposition of KAREN FORCHETTE, taken by counsel for the Plaintiffs pursuant to notice and by agreement of counsel, under the Georgia Civil Practice Act, reported by Tracy E. Barksdale, RPR, CCR, at Bouhan Falligant, One West Park Avenue, Savannah, Georgia, on October 12, 2022, commencing at 2:13 p.m.

Transcript Prepared By:

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1 the nursing staff; is that right?

2 A. That's correct.

3 Q. The staff evaluations and corrective
4 action?

5 A. Yes.

6 Q. Were you only responsible for managing
7 nursing staff? Were there other parts of the
8 healthcare system that you had to supervise?

9 A. No. Just nursing.

10 Q. As the director of nursing, did you
11 participate in -- this has on 52, for taking man down
12 drills, events, 56 participates in CQI?

13 A. Yes.

14 Q. Did you participate in the reviews of, I
15 believe you called them sentinel events?

16 A. Yes.

17 Q. And that includes when somebody dies in
18 jail?

19 A. Correct.

20 Q. Tell me what the process is when -- I know
21 a lot of places call it a mortality review, but what
22 do you call it when you guys critique yourself,
23 critique your response to an incident when a person
24 dies in the jail?

25 MR. JOYCE: I'll object to the extent this

1 calls for information about quality assurance or peer
2 review.

3 I'll let you answer the questions in
4 general terms, but try to stay away from discussing
5 any specific cases, if you can.

6 THE WITNESS: Okay. When someone -- this
7 would be the HSA role, when someone passes away, we
8 do a short, brief critique with the medical director,
9 and then later down the -- later, after the event,
10 there's a more thorough review done at a corporate
11 level.

12 BY MR. UTTER:

13 Q. What's the purpose of that review? Let's
14 take it in two parts. What's the purpose of the one
15 you do at the scene or at the jail with the medical
16 director?

17 A. Just while it's fresh in everyone's -- the
18 events are fresh in people's memories, to get those
19 down on paper and --

20 Q. So is it fair to say that you do that
21 right then for accuracy?

22 A. Based on what we know at the time.

23 Q. Right. Right. When you're saying
24 fresh --

25 A. Yes.

1 Q. -- means as soon as after the event as
2 possible, so people are getting their thoughts when
3 the memory is fresh; is that right?

4 A. It's not an opinion. It's a short, quick
5 form with check boxes that documents what happened as
6 best as we know.

7 Q. And do you do that so it's the -- I
8 believe you started the conversation by saying that
9 this is what the HSA does?

10 A. Yes.

11 Q. You know that because when you retired,
12 you were the HSA?

13 A. Correct.

14 Q. The HSA do that alone, or is that with the
15 medical director?

16 A. With the medical director.

17 Q. Anybody else participate in that?

18 A. Not formally. She may ask my opinion as
19 the DON or some answers to some of the questions, but
20 it's her responsibility.

21 Q. Okay.

22 A. His or her.

23 Q. Okay. Is there any other reason that you
24 know of besides, I'm saying the purpose of this
25 review, you said there's one to make sure it's fresh

1 in a person's memory, any other purpose?

2 A. To notify our legal department of an
3 event.

4 Q. That's done by sending that information in
5 the check box form?

6 A. Yes.

7 Q. That you review with the medical director
8 up to corporate?

9 A. Correct.

10 Q. Which is Atlanta?

11 A. Yes.

12 Q. Is there any other purpose besides fresh
13 in your mind and notifying legal for doing that
14 review?

15 A. Not to my knowledge.

16 MR. JOYCE: And I want to be clear, you're
17 testifying individually, not on behalf of the
18 corporation.

19 BY MR. UTTER:

20 Q. So let's go back to Exhibit 2, if you
21 will. That last page there, Bates 003, you said you
22 haven't seen the other two, but this document
23 indicates that on November 15th, 2017, you became the
24 health services administrator; is that true?

25 A. Yes.